

## **FCC 17-26**

### **Comments**

#### **Performance Measures**

##### **A Rating System for Quality Assessment**

VRS video users should have a way to rate each VRS interpreter they have encountered during a particular call. The rating system could mirror the five-star system commonly used on the Internet for restaurants, hotels, and retail items.

As each VRS call is completed or before a VRS call is transferred to another interpreter, an optional survey could display on the video screen for the video caller to do the following:

1. Rate the interpreter from one to five stars, with five stars meaning “excellent”.
2. Offer additional comments.
3. Skip the survey.

Quality assessments using scripts often render skewed results because the evaluators are already familiar with the scripts. Unlike actual VRS video callers, evaluators of scripted assessments are not forced to rely on the interpretations to understand what is being said by the audio user. Since evaluators already know what they expect to see in an interpretation, they naturally tend to overrate the interpretations on clarity and comprehensibility. The most frequent complaint that I hear from Deaf people about VRS is that many of the interpretations “are not clear” or are not readily understandable in their entirety. Using a scripted quality assessment will fail to address this frequent complaint.

Because VRS video users do not have access to the source message—the audio side of their calls—their feedback on a rating system would serve as an excellent gauge of the comprehensibility and fluency of the interpretations.

##### **“Phony” VRS Calls**

The Commission is to be commended for addressing the problem of audio callers using VRS to perpetrate scams against individuals who are deaf or hard of hearing. This issue has plagued VRS for all of the eleven years that I have been a VRS interpreter. During that time, VRS interpreters have been told repeatedly by their employers that the FCC (1) has been aware of the issue and (2) has required interpreters to process such blatant scam calls and log the calls as billable. Interpreters have become habituated to this “expectation”, and many VRS interpreters have come to believe that the RID Code of Professional Conduct also requires them to interpret for such fraudsters. These interpreters have failed to recognize that the RID codes of ethics over the years, designed for community interpreting, were never intended to require interpreters to work in behalf of criminal endeavors. Other VRS interpreters, disgusted by the requirement to interpret for such illegal activity, have left VRS to return to community interpreting, where they are not required to work for people who openly defraud others.

To begin to effectively address the problem, the Commission must clearly communicate its position to VRS interpreters directly. Many interpreters would be shocked, for example, to read Commissioner Clyburn's statement and paragraph 78 from this Notice of Inquiry.

In addition, the Commission should require VRS providers to train its interpreters monthly using information about scam calls from the Federal Trade Commission's Web site.

### **Non-compete Provisions in VRS CA Employment Contracts**

The removal of non-competition agreements from VRS Interpreters' employment contracts would result in improved working conditions for VRS Interpreters and, subsequently, in increased recruitment of high-level, more experienced interpreters. Both results would support the FCC's mandate for functional equivalence.

Sincerely,  
Lisa Fritz  
RID: CI/CT

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